

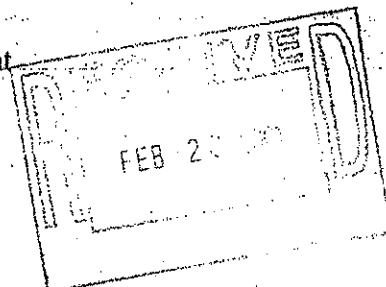
EXHIBIT C



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February 16, 2001

Mr. Kenneth Kahora, Case Manager
New Jersey Department of Environmental Protection
Bureau of Environmental Evaluation and Cleanup Responsibility Assessment
401 East State Street
P.O. Box 028
Trenton, New Jersey 08625-0028



Re: Interim Remedial Investigation Report - Groundwater Addendum
Former F. Sharp Screw Site
Somerville, New Jersey
ISRA Case Nos. 85647, 85648, and 85649

Dear Mr. Kahora:

JM Sorge, Inc. has been retained by Litgo of New Jersey, Inc. (Litgo) to perform remedial investigation activities at the above referenced property. This letter was prepared in response to our teleconference of December 15 and your letter of December 28, 2000. As discussed, the following provides an interim RI report in order to provide the latest sampling data in order to assist the Department in the approval of additional well locations in the central portion of the site. JMS will incorporate all the attached results in a formal RI report following installation and sampling of the central site wells, as discussed during our recent teleconference. A site location map is included for reference as Figure 1.

JMS has completed additional investigations of the groundwater and soil in November through December 2000. These investigation activities were discussed with Department representatives during our meeting in November 2000. The objective of this phase of the project is to verify to the Department's satisfaction that there are no remaining sources of groundwater contamination on the western three quarters of the site and to obtain the Departments concurrence that the approved site development can proceed in that area. We are not seeking Department approval to develop the southeastern corner of the site which exhibits excessive groundwater contamination. Additional groundwater delineation and remediation will be required to address the southeastern corner of the site.

Groundwater sampling activities were performed to verify present conditions and to obtain concurrent groundwater quality and elevation data with the adjacent Egan Machinery site. In addition, all of the 19 existing wells were resurveyed to address discrepancies identified in the top of casing elevations of several wells. JMS utilized the same surveyor as Egan for re-surveying the wells to insure consistency across the site boundary. As requested by the Department, all monitoring wells were also Video logged to determine if and where preferential flow pathways exist. The site investigation was conducted in accordance with the letter dated

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December 1, 2000, Field Sampling Procedures Manual (FSPM - May 1992), and the Technical Requirements for Site Remediation (TRSR).

Soil sampling activities were also completed to determine if any source areas for the elevated concentrations of Trichloroethene (TCE) in the groundwater exist in the central and western portions of the site. The objective, as discussed with the Department was to verify that there are no significant sources of TCE contamination present on the western three fourths of the site. The data was also obtained to assist in the selection of the three additional monitoring wells which will be installed in the central portion of the site as final verification that no TCE contamination source remains on the site.

All soil and groundwater samples were submitted to Accutest Laboratories, a New Jersey certified laboratory. All but 12 samples were analyzed within their respective holding times. The analyses run out of holding time were for nitrite only. The holding time for the nitrite analysis was 48 hours and samples were run no more than 3 to 4 days out of the holding time. Additionally, method detection limits were achieved and all applicable precision and accuracy requirements were met. Based on these criteria the laboratory data for these investigation activities is considered reliable. Laboratory quality assurance/quality control data can be found with the laboratory deliverables provided in Attachment 1 (under separate cover).

SOIL INVESTIGATION

In accordance with JMS letter dated December 1, 2000 and NJDEP response letter dated December 28, 2000, JMS conducted a soil boring and sampling program in December 2000. Boring locations were chosen to determine if a soil source was still on site and to assist in the determination of the placement of the three proposed groundwater monitoring wells. A total of 75 samples were collected from 38 borings across the site. Soil boring locations are illustrated in Figure 2.

Samples were collected using hollow stem auger and continuous split-spoon sampling techniques. All borings were performed by a New Jersey licensed driller. Soil borings were advanced and continuously sampled until competent bedrock was encountered. However, in areas inaccessible to the drill rig, borings were advanced with a stainless steel hand auger. At each boring location soil was continually field-screened with a photo-ionization detector (PID) for the presence of volatile organic compounds (VOC). In addition, field personnel noted any evidence of impacted soil including discoloration or staining, visible sheens, or odors. Boring logs are included as Attachment 2.

Equipment decontamination activities were conducted between sampling locations. Decontamination consisted of a liquinox wash, tap water rinse, followed by a distilled water rinse of the stainless steel soil sampling utensils. Each sample collected for laboratory analysis was clearly labeled and placed in a cooler at 4°C (wet ice) for transport to a New Jersey-certified laboratory. Strict chain-of-custody protocol was employed to ensure the validity of data generated by these sampling activities.

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Sampling was conducted in three areas of the site and adjacent properties. The southeastern portion of the site, the northern and western drainage ditch and sewer line, and the central portion of the site. The soil sampling activities performed in each of the areas is outlined below.

AOC #2 - SOUTHEASTERN PORTION OF SITE

During an aerial photo review of the site and adjacent properties, two issues were identified regarding the adjacent property to the east of the F. Sharp site. The aerial photos indicated that the entire property consisting of Lot 4.01 and Block 1 of the Boro of Somerville has been filled and disturbed historically dating back to the earliest aerial photo in 1940. In addition, an area of dark staining appears in the 1969 photo in the area corresponding to the location of MW-11. Visual observations along the railroad track area indicate that the fill material consists primarily of ash and cinder fill.

To evaluate whether the dark stained area is potentially a source area for the concentrations of TCE identified in well MW-11, additional soil borings were proposed. Nine (9) soils borings were performed in the vicinity of the area of dark staining. Each boring was advanced to the top of the bedrock surface with continuous split-spoon sampling techniques. Samples were collected from the 18 to 24 and 30 to 36 inch interval below the asphalt. One additional sample was collected from the interval exhibiting the highest field screening results, or the 0 to 6 inch interval above the bedrock. Samples were submitted for analysis for volatile organic compounds plus 15 peaks. A total of twenty-eight (28) samples were collected from the nine (9) borings in the vicinity of the area of dark staining.

In addition, the Department's letter dated December 28, 2000, requested two additional borings in the vicinity of MW-11 and three additional borings in the area of the MW-5 cluster to evaluate the presence of a potential source in these areas.

Sample Collection

Nine borings, B-1 through B-9, were advanced in the area of the staining visible on the 1969 aerial photograph. Borings B-1 through B-9 were sampled at the following intervals: 18-24", 30-36", and 0-6" above rock. In general the upper one foot consisted of asphalt and gravel fill. A one foot thick layer of ash/cinder material was encountered at depths of approximately 1.0-2.0 feet. Weathered bedrock consisting of silt, sand, and clay was encountered from 2 feet to 8.5 feet below ground surface at which point bedrock was typically encountered. No other significant odors or visual indications of contamination were noted. No significant PID readings were recorded.

Two borings, B-24 and B-25 were advanced approximately 20 feet on either side of MW-11. B-24 and B-25 were sampled at the following intervals: 18-24", 30-36", and 0-6" above rock. A layer of ash/cinder material was encountered at depths of approximately 1.0 foot to 4.0 feet below ground surface. Weathered bedrock consisting of red/brown silt and clay from approximately 4 feet to the top of bedrock, approximately 6.5 to 7 feet below ground surface. No

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other significant odors or visual indications of contamination were noted. No significant PID readings were recorded.

Three borings, B-26 through B-28, were advanced in the area of the MW-5, MW-5A, and MW-5B well cluster. Borings B-26 through B-28 were sampled at the interval of the highest PID reading or where contamination was evident. A similar layer of ash/cinder material was encountered at depths of approximately 1 to 2 feet. Bedrock was encountered at approximately 4 to 5 feet below ground surface. No other significant odors or visual indications of contamination was noted. A PID reading of 20.4 ppm was recorded in boring B-26 and a sample was collected at that interval (24-30") for analysis. This is consistent with soil descriptions from previous investigations. Boring logs are included in Attachment 2.

Laboratory Analytical Results

Trichloroethene (TCE) was detected in only three of the 38 samples collected from these three areas; B-5 contained TCE at a concentration of 0.406 ppm at the 18-24" interval but was not detected at 30-36" or 48-54" intervals; B-8 contained TCE at a concentration of 0.305 ppm at the 18-24" interval but was not detected at 30-36" or 42-48" intervals; and B-28 contained an estimated concentration of TCE of 0.236 ppm at 12-18" interval.

Conclusions and Recommendations

TCE was only detected in 3 of the 38 samples collected from these three areas. All of the 3 samples contained concentrations of VOCs well below the Department's Impact to Groundwater Soil Cleanup Criteria (IGWSCC) of 1 ppm and significantly below the Residential Direct Contact Soil Cleanup Criteria (RDCSCC) of 23 ppm. A summary of the analytical results for this AOC is included as Table 1 and are illustrated in Figure 2. Laboratory data deliverables are included in Attachment 1 (under separate cover).

Based on the soil sampling results, these areas are not considered to be potential sources for the contamination identified in monitoring wells MW-5A and MW-11. Therefore no additional investigation of these areas is proposed.

AOC #3 - NORTHERN AND WESTERN DRAINAGE DITCH AND SEWER LINE

To investigate potential sources of contamination identified in the monitoring wells on the western portion of the site soil sampling was performed. The samples were performed in accordance with the activities proposed in the December 1, 2000 letter and the Department's December 28, 2000 response. Based on the aerial photo review, two areas in the western portion of the site were identified as possible sources for the contamination identified in monitoring wells on the western portion of the F-Sharp property, a former drainage ditch and an existing sewer line.